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4300 Six Forks Road  
Raleigh, NC 27609-5746  
(919) 863-7000  
(800) 849-9100  
(919) 863-7319 Fax  
[www.btitelecom.net](http://www.btitelecom.net)

VIA FACSIMILE AND OVERNIGHT MAIL

October 1, 2003

Mr. Ron Jones  
Director, Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: Docket No. 03-00502, Implementation of County Wide Calling  
Workshop to Gather Information from Telecommunications Industry  
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114

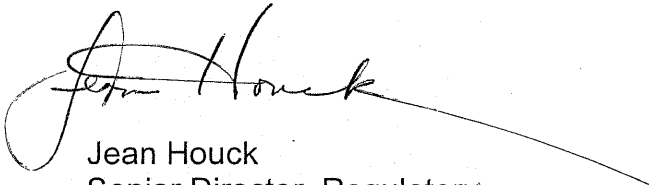
Dear Mr. Jones:

Enclosed is the response of Business Telecom, Inc. (BTI) to your request for information concerning the manner in which BTI complies with Tenn. Code Ann. § 65-21-114(a).

If you have any questions regarding this matter please contact me at 919-863-7325.

Sincerely,

BUSINESS TELECOM, INC.



Jean Houck  
Senior Director, Regulatory

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September 30, 2003

LIGHTYEAR

T.R.A. DOCKET ROOM

Via Overnight Delivery

Ron Jones  
Director/Moderator  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37219-0412

**Re: Docket 03-00502: Implementation of County Wide Calling  
Response of Lightyear Communications, Inc.**

Dear Mr. Jones:

Lightyear Communications, Inc. ("Lightyear") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Lightyear is authorized to provide local and long distance telecommunications services in Tennessee, are in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

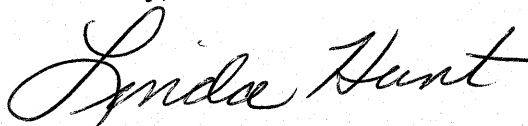
When County Wide Calling was mandated, BellSouth was put in charge of creating the Master Taxing Area Rate File or "TAR" file. Lightyear utilizes the BellSouth Master TAR File to determine the appropriate rating of calls. Calls that are designated in the Master TAR File as within the customer's local calling area are treated as toll-free calls. The BellSouth Master TAR File reflects the toll free county-wide calling areas within Tennessee. Calls within the same county are classified as local calls in the Master TAR File and are not assessed toll charges by the Companies. There have not been any technical, operational, administrative or other difficulties encountered in complying with T.C.A. § 65-21-114. There is no cost to Lightyear for this Master TAR File.

Lightyear has no suggestions as to how the proposed workshop should proceed, but would offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (502) 244-6666 Ext. 1019 or via e-mail at [lindah@lightyearcom.com](mailto:lindah@lightyearcom.com).

Sincerely,



Linda Hunt  
Manager of Regulatory Affairs

Enclosures



210 N. Park Ave.  
Winter Park, FL  
32789

P.O. Drawer 200  
Winter Park, FL  
32790-0200

Tel: 407-740-8575  
Fax: 407-740-0613  
tmi@tminc.com

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October 1, 2003  
Via Overnight Delivery

T.R.A. DOCKET ROOM

Mr. Ron Jones  
Director/Moderator  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37219-0412

**Re: Docket 03-00502; Implementation of County Wide Calling  
Response of LDMI Telecommunications, Inc.  
d/b/a LDMI Telecommunications also d/b/a FoneTel**

Dear Mr. Jones:

LDMI Telecommunications, Inc. d/b/a LDMI Telecommunications also d/b/a FoneTel (LDMI) submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

LDMI is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).


As a switchless reseller in Tennessee, LDMI utilize the services of underlying facilities based interexchange carriers. Therefore, LDMI is dependent upon the identification of toll free calling based on the systems and databases of the underlying carriers. Currently the primary underlying carrier of LDMI in Tennessee is Global Crossing.

LDMI has no suggestions as to how the proposed workshop should proceed, but offers any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at sdawson@tminc.com.

Sincerely,

  
Shari Dawson  
Consultant

cc: Brad Shires - LDMI  
File: LDMI - TN  
TMS: LDMI TNx0301

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T.R.A. DOCKET ROOM

Via Fax & Overnight Mail

October 1, 2003

Ron Jones, Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: Docket 03-00502  
Workshop to Gather Information on County-wide Calling

Dear Mr. Jones:

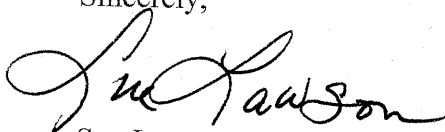
Pursuant to the information requested by the TRA on September 16, 2003, ITC^DeltaCom has in place steps for compliance with Tennessee Code Ann. § 65-21-114, which states any telephone call made between two (2) points in the same county in Tennessee shall be classified as toll-free and shall not be billed to any customer.

ITC^Deltacom uses a two-step process for verifying calls made between two (2) points in the same county as follows:

- **Step 1**  
Mileage of the call is checked using Vertical & Horizontal (V&H) coordinates from the Local Exchange Routing Guide (LERG). If the mileage is less than or equal to 16 miles, the call is then dropped and not billed.
- **Step 2**  
The originating and terminating NPA/NXX is used to retrieve the GeoCode from the tax package (the GeoCode being a number in SS-CCC-LLLL format where SS=State, CCC=County, and LLLL=City/Location). County codes are then compared, and if they are the same, the call is dropped and not billed.

In both steps the call is still listed on the customers bill, but is zero rated.  
Should you need additional information, please feel free to contact me at 256-382-3967.

Sincerely,



Sue Lawson  
Regulatory Manager



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October 2, 2003  
Via Facsimile and Overnight Delivery

210 N. Park Ave.  
Winter Park, FL  
32789

P.O. Drawer 200  
Winter Park, FL  
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tmi@tminc.com

Mr. Ron Jones  
Director/Moderator  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37219-0412

T.R.A. DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling  
Response of Broadwing Communications LLC**

Dear Mr. Jones:

Broadwing Communications LLC ("Broadwing") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Broadwing is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

Broadwing accesses a database to compare the originating and terminating telephone numbers from call detail records to values from the database (TAR value). When the TAR values match, the call is dropped from further processing and treated as unbillable. This prevents the call from being billed to end users or wholesale resellers of Broadwing's service. The TAR tables are updated monthly from a tape published by BellSouth. The retail billing system also uses a TAR table and verifies the CDR against the TAR table as the record is loaded into the billing system. This acts as a secondary control in the unlikely event that an unbillable call did not drop out with the earlier process. This table also captures any offnet traffic that may be loaded directly into the billing system without going through the on-net system.

The Verizon affiliates have no suggestions as to how the proposed workshop should proceed, but offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose. Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at cwightman@tminc.com.

Sincerely,

  
Connie Wightman  
Consultant

cc: Karen Hanson  
File: BWING - TN

TMS: TNx0302



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VIA FACSIMILE AND OVERNIGHT MAIL

October 1, 2003

Mr. Ron Jones  
Director, Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: Docket No. 03-00502, Implementation of County Wide Calling  
Workshop to Gather Information from Telecommunications Industry  
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114

Dear Mr. Jones:

Enclosed is the response of Business Telecom, Inc. (BTI) to your request for information concerning the manner in which BTI complies with Tenn. Code Ann. § 65-21-114(a).

If you have any questions regarding this matter please contact me at 919-863-7325.

Sincerely,

BUSINESS TELECOM, INC.

Jean Houck  
Senior Director, Regulatory

DOCKET 03-00502  
WORKSHOP TO GATHER INFORMATION FROM THE  
TELECOMMUNICATIONS INDUSTRY RELATED TO PREVENTING  
VIOLATIONS OF TENN. CODE ANN. § 65-21-114

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

**RESPONSE:** BTI orders TAR (Taxing Area Rate) Code information from BellSouth. As part of that process, BTI submits a bi-monthly file to BellSouth containing the ten-digit telephone number and TAR Code for BTI customers in order that the information may be included in a statewide file maintained by BellSouth.

BTI receives the TAR Code information from BellSouth each month and loads the information into its billing system. Any calls received by BTI from its customers in Tennessee are processed against the TAR files and dropped from the billing database if the TAR Code associated with the originating number matches the TAR Code associated with the destination number.

- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

**RESPONSE:** BTI has experienced problems with customers calling claiming that calls were intra-county when the TAR Code file does not validate that both telephone numbers were located in the same county. If BTI can determine that there was an error in the TAR Code file then we will credit the customer's account.

The BellSouth service is not error free, there appears to be issues with ported numbers and the fact that not all CLECs report TAR Code and telephone number information to BellSouth. This is problematic and could explain the customer calls that BTI receives.

- Provide a suggestion for how this workshop should proceed.

**RESPONSE:** BTI does not have any suggestions as to how the proposed workshop should proceed. However, all CLECs operating in Tennessee should be required to provide TAR Code and telephone number information to either BellSouth or a third party administrator. This will ensure that all local telephone companies have access to accurate information in order to provide free intra-county calling in Tennessee.





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Mr. Ron Jones  
Director/Moderator  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37219-0412

**Re: Docket 03-00502; Implementation of County Wide Calling  
Response of Network Communications International Corp.**

Dear Mr. Jones:

Network Communications International Corp. ("NCIC") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

NCIC has no presubscribed customers in Tennessee. All NCIC calls are operator treated and billed via LEC billing through a third party billing aggregator. Local calls would not normally route through the company if the customer follows the dialing instructions on the phone or tent card. To the extent that customers occasionally dial local calls as if they are long distance, NCIC handles these incidental calls and bills them like any other toll calls. The company does not have the data bases necessary to identify intracounty calls on an NPA-NXX basis. In order to obtain the necessary information, the company would have to invest more revenue than it will generate in Tennessee in approximately five years. NCIC has received no inquiries or complaints concerning intracounty calling to date. If any customer were to call identifying a billed call as intracounty, NCIC would credit any billing errors and take any additional actions required to ensure customer satisfaction.

The operational difficulties and expense of implementing real time intracounty toll free calling for operator handled calls are a true impediment for small competitors. The gains to the public would be miniscule compared to the cost. NCIC suggests a mileage surrogate for small companies would be a reasonably inexpensive approach that could be easily implemented.

The company has no suggestions as to how the proposed workshop should proceed, but would offer any support required or requested by the TRA.

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